

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: ) Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., et al. ) Jointly Administered  
Debtors. ) Chapter 11 Proceeding  
 ) Hon. Kevin R. Huennekens

## **MOTION TO ADMIT PRO HAC VICE**

Neil E. McCullagh, Esquire moves this Court for an Order authorizing Michael Reynolds, Esquire (“Mr. Reynolds”) from the law firm of McCarter & English, LLP to appear and represent Casio, Inc. *pro hac vice* in the captioned bankruptcy case and any related litigation and in support of his Motion, states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Reynolds in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

2. Mr. Reynolds is a member in good standing of the Bar of the State of New York, as well as the Bar of the State of New Jersey, and is admitted to practice before the United States District Courts for the District of New Jersey, the Eastern and Southern Districts of New York,

Michael Reynolds, Esquire (*pro hac vice* pending)  
McCARTER & ENGLISH, LLP  
Four Gateway Center  
109 Mulberry Street  
Newark, NJ 07102  
Phone: (973) 849-4188  
Facsimile: (973) 624-7070

Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
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P.O. Box 1555  
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Phone: (804) 697-2000  
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as well as the United States Court of Appeals for the Third Circuit. Mr. Reynolds's business address is as follows:

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102

3. Mr. Reynolds has not been the subject of disciplinary action by the bar or courts of the State of New York, or any other state or any federal court.

4. Mr. Reynolds has not been denied admission to the courts of any state or to any federal court.

5. Mr. Reynolds is familiar with the Federal Rules of Civil Procedure. He will become familiar with and at all times abide by the Local Rules of this Court and comply with those Rules so long as this cause is pending.

6. Mr. Reynolds has completed an Application To Qualify As A Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), a copy of which is attached as Exhibit A.

7. A proposed Order granting this Motion is being submitted to the Court contemporaneously with the filing of this Motion.

WHEREFORE, Neil E. McCullagh, Esquire prays that this Court grant his Motion to permit Michael Reynolds, Esquire to represent Casio, Inc. *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully submitted this 28<sup>th</sup> day of March, 2012.

CASIO, INC.

/s/ Neil E. McCullagh  
Counsel

Neil E. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
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Facsimile: (804) 697-2194  
*Co-Counsel for Casio, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of March, 2012, a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid, and/or electronic means through the Court's ECF system on the following, constituting all necessary parties:

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/s/ Neil E. McCullagh